

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**KALYN STEPHENS,** )  
 )  
**Plaintiff,** )  
 )  
**v.** )  
 )  
**SULLIVAN & CROMWELL, LLP,** )  
**ET AL.,** )  
 )  
**Defendants.** )

**CIVIL ACTION NO.**  
**1:14-cv-2659-TWT-JFK**

**MOTION FOR AN EXTENSION OF TIME TO ANSWER**

COME NOW Defendants the New York State Supreme Court, the late Judge Louis York, Norman Goodman, Esq., Helen Muller, Robert Portas, Anne Marie Scribano, Gloria Brandon, the New York State Supreme Court Appellate Division, and Susanna Rojas, Esq. (collectively, "State Defendants"), by and through the Attorney General of the State of New York, and hereby move this Court for an order extending their time to answer, move, or otherwise respond to the complaint from December 12, 2014, to February 11, 2015, or until such time as the Court deems appropriate.

The New York State Office of the Attorney General represents Defendants  
New York State Supreme Court, Norman Goodman, Esq., Helen Muller, Robert  
Portas, Anne Marie Scribano, Gloria Brandon, New York State Supreme Court

Appellate Division, and Susanna Rojas, Esq. The New York Surrogate's Court has not yet appointed a personal representative for the estate of Judge Louis York, but this Office expects to represent Judge York's interests in this action, and we include him in the instant motion to protect his rights in this litigation, as required by New York law.

An extension is necessary because of (i) the recent assignment of counsel to this case and the need to review the 612-page, 2287-paragraph complaint and the exhibits attached thereto, (ii) the retention on December 10, 2014, of designated local counsel; (iii) the need to determine which defendants have been served and whether the purported service was timely and adequate, (iv) the need to await the appointment of a representative of Judge York's estate before formally being retained on its behalf; and (v) the difficulty of communicating with the State Defendants during the holiday season.

On December 11, 2014, this Office twice sought Plaintiff's consent for an extension by calling her and leaving voicemail messages at the phone number listed on the docket. Plaintiff did not return our calls.

**CONCLUSION**

WHEREFORE the State Defendants respectfully request that this Court enter an order extending their time to respond to the complaint until February 11, 2015, or until such time as the Court deems appropriate.

Dated: December 12, 2014  
New York, New York

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York

/s/ Angel M. Guardiola, II  
*PHV Pending*  
Assistant Attorney General  
120 Broadway, 24th Floor  
New York, New York 10271  
Tel.: (212) 416-6696  
Fax: (212) 416-6009  
angel.guardiola@ag.ny.gov

*Attorneys for New York State Defendants*

SAMUEL S. OLENS 551540  
Attorney General of the State of Georgia

/s/ Dennis R. Dunn 234098  
Deputy Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334-1300  
ddunn@law.ga.gov

*Designated Local Counsel for  
New York State Defendants*

## CERTIFICATE OF SERVICE

I hereby certify that on this date, December 12, 2014, I have electronically filed the foregoing **MOTION FOR AN EXTENSION TO ANSWER** using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record as follows:

None, pro se

I hereby certify that I mailed by United States Postal Service the document to the following non-CM/ECF participants:

KALYN STEPHENS  
Plaintiff *Pro Se*  
525 Arbor Circle  
Tucker, GA 30084

/s/ Angel M. Guardiola, II  
ANGEL M. GUARDIOLA, II  
*PHV Pending*

120 Broadway, 24th Floor  
New York, New York 10271  
Tel.: (212) 416-6696  
Fax: (212) 416-6009  
angel.guardiola@ag.ny.gov